Filing date:

ESTTA Tracking number:

ESTTA461187 03/12/2012

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91186734
Party	Plaintiff Tequila Cuervo La Rojena, S.A. de C.V.
Correspondence Address	MARIE ANNE MASTROVITO ABELMAN FRAYNE & SCHWAB 666 THIRD AVENUE NEW YORK, NY 10017 UNITED STATES MAMastrovito@lawabel.com, Rdahl@lawabel.com
Submission	Motion to Extend
Filer's Name	Marie Anne Mastrovito
Filer's e-mail	mamastrovito@lawabel.com
Signature	/MAM/
Date	03/12/2012
Attachments	20120312152351325.pdf ( 3 pages )(79955 bytes )

# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter Of: Trademark Application No. 77 RESERVA DE FAMILIA	7/226893 for
Tequila Cuervo la Rojena, S.A.,	
Opposer,	
v.	Opp. No. 91186734
Vina Santa Carolina, S.A.,	•
Applicant.	• • •

#### MOTION TO EXTEND DATES OF PROCEEDING

Opposer hereby requests an additional thirty day extension of the deadlines for filing the Trial Briefs in the captioned proceeding.

This request is made in good faith and not for mere delay. Opposer believes that the parties are very close to achieving a final settlement of this matter. A draft Agreement has been circulated. As of of Friday March 9, 2012, Opposer had only one small change to the Agreement which has been sent to the Applicant for their consideration.

The Agreement is worldwide in scope, and, as a result, the negotiation process has been time consuming.

In addition, the scheduling in this matter is unclear because the Board has not yet ruled on Opposer's Motion to Extend filed on February 13, 2012.

For the reasons set forth above, the Opposer respectfully requests that the Board grant the requested extension of time. With the Extension, Opposer's Brief will be due no sooner than April 11, 2012, and the Applicant's Brief will fall due 30 days thereafter.

Respectfully submitted,

// [ me / me / / // max

### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing MOTION TO EXTEND DATES OF PROCEEDING was served by electronic mail on this 12<sup>th</sup> day of March, 2012, upon counsel for Applicant:

#### **CHARLES GORENSTEIN**

BIRCH STEWART KOLASCH & BIRCH LLP PO BOX 747 FALLS CHURCH, VA 22040-0747

MARIE-ANNE MASTROVITO